

REMARKS

In order to facilitate examination and allowance of this application, Applicant respectfully requests the Examiner to contact Applicant's representative, Adesh Bhargava, at 202-906-8696, for an interview should the remarks presented below not result in allowance of pending claims 1-3, 5, 11-13 and 20.

Summary of the Office Action

In the Office Action, claims 7, 9-10, 16 and 18-19 have been allowed.

Claims 1-3, 11-13 and 20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,343,461 to *Knott* in view of U.S. Patent No. 6,381,854 to *Pagliero*.

Claim 5 also stands rejected under 35 U.S.C. § 103(a) as being unpatentable over *Knott* in view of *Pagliero* and further in view of U.S. Patent No. 6,722,284 to *Gustafson*.

Summary of the Response to the Office Action

Applicant proposes amending claim 1, 11 and 13, and adding new independent claim 21. Based on the remarks presented below, claims 1-3, 5, 11-13 and 21 are pending for further consideration (claims 7, 9-10, 16 and 18-19 being allowed).

All Claims are Allowable

In the Office Action, claims 1-3, 11-13 and 20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,343,461 to *Knott* in view of U.S. Patent No. 6,381,854 to *Pagliero*. Claim 5 also stands rejected under 35 U.S.C. § 103(a) as being unpatentable over *Knott* in view of *Pagliero* and further in view of U.S. Patent No. 6,722,284 to *Gustafson*. Applicant traverses the rejection of pending claims 1-3, 5, 11-13 and 20 for the following reasons.

With regard to independent claim 1, Applicant respectfully asserts that *Knott*, *Pagliero* and *Gustafson*, viewed either singly or in combination, fail to teach or fairly suggest a trimming system for a user-operated ground vehicle capable of performing mowing and trimming operations, including at least, "a guide wheel mounted to a vehicle frame adjacent said trimming

unit for maintaining at least one trimming wire of said trimming unit at a predetermined distance from a stationary object during performance of said edge trimming operations, said guide wheel being mounted on a resiliently biased bracket, said bracket being fixedly mounted to the vehicle frame and resiliently biased by a spring mounted between the vehicle frame and said bracket for allowing material and spring biased deflection of said bracket by a predetermined distance under the bias of said spring relative to said trimming unit and the vehicle frame upon contact of said guide wheel with the stationary object,” as recited in independent claim 1.

Support for these features recited in claim 1 can be found at least in paragraphs 10-15 and 26-43 of the originally filed specification, and in Figs. 1-3 of the originally filed drawings. Specifically, as shown in Figs. 1-3, the present invention provides a trimming system 16 for a user-operated ground vehicle 12 capable of performing mowing and trimming operations. The system may include a drive means operatively coupled to a drive system of the vehicle having the trimming system mounted thereon. The system may further include a trimming unit 46 operatively coupled to the drive means for performing edge trimming operations. As clearly illustrated in Fig. 1, a guide wheel 74 may be mounted to a vehicle frame 18 adjacent trimming unit 46 for maintaining at least one trimming wire of the trimming unit at a predetermined distance from a stationary object 76 during performance of edge trimming operations. Guide wheel 74 may be mounted on a resiliently biased bracket 78, which as illustrated in Fig. 1, is fixedly mounted to the vehicle frame and resiliently biased by torsion spring 90 mounted between the vehicle frame and the bracket for allowing material and spring biased deflection of the bracket by a predetermined distance under bias of the spring relative to the trimming unit and the vehicle frame upon contact of the guide wheel with the stationary object.

With regard to independent claim 1, the Office Action asserts that *Knott, Pagliero* and *Gustafson* teach or suggest the trimming system as recited in the claims.

Knott, as indicated in the Office Action, discloses each of the elements of independent claim 1, except “a guide wheel mounted to a vehicle frame adjacent said trimming unit for maintaining at least one trimming wire of said trimming unit at a predetermined distance from a stationary object during performance of said edge trimming operations, said guide wheel being mounted on a resiliently biased bracket, said bracket being fixedly mounted to the vehicle frame and resiliently biased by a spring mounted between the vehicle frame and said bracket for

allowing material and spring biased deflection of said bracket by a predetermined distance under the bias of said spring relative to said trimming unit and the vehicle frame upon contact of said guide wheel with the stationary object.”

The Office Action thus indicates that *Pagliero* teaches the aforementioned features not taught by *Knott*.

Pagliero, as illustrated in Fig. 1 thereof, discloses a bush cutter including swinging blade 14.1, cutting means 11.2, guide wheel 22, with blade 14.1 being swingably mounted to bracket 16. As discussed in Col. 2:47-55, a return spring 19 keeps blade 14.1 swung about pin 15 in the rest position of Fig. 1.

Thus contrary to the recitation in independent claim 1 which recites guide wheel 74 mounted on a resiliently biased bracket 78, which as illustrated in Fig. 1, is fixedly mounted to the vehicle frame and resiliently biased by torsion spring 90 mounted between the vehicle frame and the bracket for allowing material and spring biased deflection of the bracket, blade 14.1 of *Pagliero* is swingably mounted about pin 15 and held in place by return spring 19. In other words, blade 14.1 of *Pagliero* is swingably mounted about pin 15, and further, only movable by means of return spring 19 (i.e. no material deformation).

Thus *Pagliero* fails to teach or fairly suggest a trimming system for a user-operated ground vehicle capable of performing mowing and trimming operations, including at least, “a guide wheel mounted to a vehicle frame adjacent said trimming unit for maintaining at least one trimming wire of said trimming unit at a predetermined distance from a stationary object during performance of said edge trimming operations, said guide wheel being mounted on a resiliently biased bracket, said bracket being fixedly mounted to the vehicle frame and resiliently biased by a spring mounted between the vehicle frame and said bracket for allowing material and spring biased deflection of said bracket by a predetermined distance under the bias of said spring relative to said trimming unit and the vehicle frame upon contact of said guide wheel with the stationary object,” as recited in independent claim 1.

Gustafson, which has been cited as disclosing a nylon guide wheel as recited in dependent claim 5, nevertheless fails to overcome the aforementioned deficiencies in the teachings of *Knott* or *Pagliero*.

As pointed out in M.P.E.P. § 2143.03, “[t]o establish prima facie obviousness of a claimed invention, all the claimed limitations must be taught or suggested by the prior art”. *In re Royka*, 409 F.2d 981, 180 USPQ 580 (CCPA 1974). Since these criteria have not been met, Applicant respectfully asserts that the rejections under 35 U.S.C. § 103 (a) should be withdrawn because *Knott*, *Pagliero* and *Gustafson* do not teach or suggest each feature of independent claim 1.

In view of the above arguments, Applicant respectfully requests the rejection of independent claim 1 under 35 U.S.C. § 103 be withdrawn. Additionally, claims 2, 3, 5 and 20, which depend from independent claim 1, are allowable at least because their base claim is allowable, as well as for the additional features recited therein.

Independent claim 11

With regard to independent claim 11, Applicant respectfully asserts that *Knott*, *Pagliero* and *Gustafson* fail to teach or fairly suggest a vehicle for performing mowing and edge trimming operations, the vehicle including, “a mowing system for performing mowing operations; a trimming system for performing edge trimming operations and being operatively coupled to a drive system of said vehicle for at least one of selectively and simultaneously driving said mowing and trimming systems, and a guide wheel mounted to a vehicle frame adjacent said trimming system for maintaining at least one trimming wire of said trimming system at a predetermined distance from a stationary object during performance of said edge trimming operations, said guide wheel being mounted on a resiliently biased bracket, said bracket being fixedly mounted to the vehicle frame and resiliently biased by a spring mounted between the vehicle frame and said bracket for allowing material and spring biased deflection of said bracket by a predetermined distance under the bias of said spring relative to said trimming system and the vehicle frame upon contact of said guide wheel with the stationary object,” as recited in independent claim 11.

Applicant respectfully asserts that independent claim 11 is allowable for at least the reasons presented above for the allowance of independent claim 1, and the additional features recited therein. In the interest of avoiding redundant arguments, the reasons for allowance of independent claim 11 are not repeated herein. Additionally, claim 12 which depends from

independent claim 11, is allowable at least because its base claim is allowable, as well as for the additional features recited therein.

Independent claim 13

With regard to independent claim 13, Applicant respectfully asserts that *Knott, Pagliero* and *Gustafson* fail to teach or fairly suggest a mowing and trimming system including, “a drive unit including at least one drive and driven pulley, said drive pulley being operatively coupled to said driven pulley to at least one of selectively and simultaneously drive a mowing unit for performing mowing operations and a trimming unit for performing edge trimming operations, and a guide wheel mounted to a vehicle frame, having said mowing and trimming system mounted thereon, adjacent said trimming unit for maintaining at least one trimming wire of said trimming unit at a predetermined distance from a stationary object during performance of said edge trimming operations, said guide wheel being mounted on a resiliently biased bracket, said bracket being fixedly mounted to the vehicle frame and resiliently biased by a spring mounted between the vehicle frame and said bracket for allowing material and spring biased deflection of said bracket by a predetermined distance under the bias of said spring relative to said trimming unit and the vehicle frame upon contact of said guide wheel with the stationary object,” as recited in independent claim 13.

Applicant respectfully asserts that independent claim 13 is allowable for at least the reasons presented above for the allowance of independent claim 1, and the additional features recited therein. In the interest of avoiding redundant arguments, the reasons for allowance of independent claim 13 are not repeated herein.

Independent claim 21

With regard to independent claim 21, Applicant respectfully asserts that *Knott, Pagliero* and *Gustafson* fail to teach or fairly suggest trimming system for a user-operated ground vehicle capable of performing mowing and trimming operations, the system including, “drive means operatively coupled to a drive system of the vehicle having said trimming system mounted thereon; a trimming unit operatively coupled to said drive means for performing edge trimming operations; and a guide wheel mounted to or adjacent said trimming unit for maintaining at least

one trimming member of said trimming unit at a predetermined distance from a stationary object during performance of said edge trimming operations, a height of said guide wheel being adjustable relative to the vehicle,” as recited in independent claim 21.

Applicant respectfully asserts that independent claim 21 is allowable for at least the reasons cited in the Official Action for the allowance of independent claim 7, and the additional features recited therein.

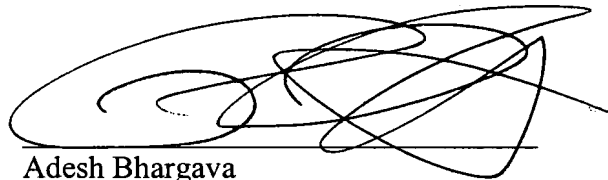
CONCLUSION

In view of the foregoing, Applicant respectfully requests reconsideration and the timely allowance of the pending claims. Should the Examiner feel that there are any issues outstanding after consideration of the response, the Examiner is invited to contact the Applicant's undersigned representative to expedite prosecution.

If there are any other fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 04-2223. If a fee is required for an extension of time under 37 C.F.R. §1.136 not accounted for above, such an extension is requested and the fee should also be charged to our Deposit Account.

Respectfully submitted,

DYKEMA GOSSETT PLLC



By:

Adesh Bhargava
Reg. No. 46,553

Dated: September 7, 2007

DYKEMA GOSSETT PLLC
1300 I Street, N.W., Suite 300 West
Washington, D.C. 20005
(202) 906-8696